

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAJOR GEORGE TILLERY,	:	CIVIL ACTION
Petitioner,	:	
	:	
v.	:	
	:	
KENNETH EASON, et al.,	:	No. 20-2675
Respondents.	:	

**FIRST MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

1. On June 5, 2020, the Third Circuit granted petitioner Major Tillery leave to file the present successive petition for a writ of habeas corpus. *In re: Major G. Tillery*, C.A. No. 20-1941.

2. On February 5, 2021, the Respondents filed a response to Tillery's petition (ECF No. 13).

3. On June 6, 2021, Tillery filed a reply to the response (ECF No. 16).

4. On December 15, 2021, Respondents filed a motion to stay proceedings for voluntary discovery (ECF No. 23).

5. On January 10, 2022, proceedings were stayed (ECF No. 26).

6. On June 2, 2022, Tillery, through counsel, filed an amended petition for writ of habeas corpus (ECF No. 28).

7. On July 13, 2022, the stay was lifted and Respondents were ordered to respond on or before August 12, 2022 (ECF No. 32).

8. Respondents respectfully request a 90-day extension of time to file their response. The undersigned currently has a heavy caseload involving numerous other cases and therefore requires additional time to complete

an appropriate response in this matter. The undersigned's caseload is particularly heavy given that the Federal Litigation Unit in the District Attorney's Office is understaffed and currently operating at sixty percent of its normal staffing. Respondents fully appreciate the importance of this Court's deadlines and are only requesting an extension out of necessity.

WHEREFORE, Respondents respectfully request that they be granted 90 days, until November 10, 2022, to file a response to the amended petition.

Respectfully submitted,

/s/ Shoshana D. Silverstein

SHOSHANA D. SILVERSTEIN

Assistant District Attorney

Federal Litigation Unit

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ORDER

AND NOW, this day of , 2022, Respondents' time to file a response to the amended petition for writ of habeas corpus is extended to November 10, 2022.

BY THE COURT:

LYNNE A. SITARSKI
UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I certify that on August 12, 2022, a copy of the foregoing motion was served on all counsel of record via the Court's electronic filing system.

/s/ Shoshana D. Silverstein
SHOSHANA D. SILVERSTEIN
Assistant District Attorney
Federal Litigation Unit